

EXHIBIT 7

Stephanie Blair

From: Brady Gleason
Sent: Friday, October 4, 2024 11:45 AM
To: Mitchell Epner
Cc: Byron Pickard; Chandrika Vira; David Wang; ParseUW; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com); Cristen Corry; Pascale, Karen; Trey Powers
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell
Attachments: 2024-10-04 Motion to Compel Compliance with Subpoenas.pdf

Mitch,

Attached is a motion to compel compliance with the Shendure and Trapnell subpoenas and request for fees and costs that we intend to file on Monday, **October 7**.

Despite our outreach, we have not heard from you since our August 29, 2024 meet and confer, wherein you promised to produce all documents responsive to the Shendure and Trapnell subpoenas, having waived any objections thereto, by September 20, 2024. Two weeks later, we still have not received a *single* document from you, despite our emails to you asking you to let us know if you would not be able to meet your own deadline for production. Nor have you provided any reason for your failure to comply with these subpoenas, which were served over *four months ago*. Parse cannot be prejudiced any longer.

If you fully comply with the required document production prior to any ruling by the court, we will withdraw the motion to compel and consider withdrawing our request for fees.

Regards,
Brady

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Wednesday, September 11, 2024 4:15 PM
To: Cristen Corry <CCorry@sternekessler.com>; Mitchell Epner <mepner@kudmanlaw.com>; Pascale, Karen <kpascale@ycst.com>; Trey Powers <TPOWERS@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

As indicated below, we anticipate that you will substantially complete production of Dr. Shendure's and Dr. Trapnell's documents by September 20, 2024. If, for any reason, you are not on track to meet this deadline, please let us know by close of business September 12, 2024.

Best,
Brady

Brady Gleason

Associate

Sterne, Kessler, Goldstein & Fox P.L.L.C.

Email: bgleason@sternekessler.com

Direct: 202.772.8638

From: Cristen Corry <CCorry@sternekessler.com>

Sent: Friday, August 30, 2024 12:40 PM

To: Mitchell Epner <mepner@kudmanlaw.com>; Pascale, Karen <kpascale@ycst.com>; Trey Powers <TPOWERS@sternekessler.com>

Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>; Brady Gleason <bgleason@sternekessler.com>

Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Thank you for taking the time to meet and confer with us yesterday. This email serves to memorialize our discussion.

You informed us that you are still in the process of document collection, but you expect to substantially complete production of all responsive documents by the week of September 16, 2024. Further, you informed us that you expect to begin rolling document productions the week of September 16, 2024. Therefore, you expect that the Shendure and Trapnell document productions will be substantially complete by September 20, 2024. If you foresee any reason you will not substantially complete document production by the week of September 16th, we request that you inform us immediately.

Additionally, you confirmed to us yesterday that you have access to all the databases we have requested to be searched for documents. It is our understanding that you also do not have any objections to the subject matter requests of the subpoenas. If either of these understandings are incorrect, please let us know immediately.

Best,
Cristen

Cristen Corry

Associate

Sterne, Kessler, Goldstein & Fox P.L.L.C.

Email: ccorry@sternekessler.com

Direct: 202.772.1293

Administrative Assistant: Kaitlin Rosebrook

Direct: 202.772.4866 **Main:** 202.371.2600

From: Mitchell Epner <mepner@kudmanlaw.com>

Sent: Wednesday, August 28, 2024 2:30 PM

To: Pascale, Karen <kpascale@ycst.com>; Trey Powers <TPOWERS@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

I am going to suggest 4 pm tomorrow.

From: Pascale, Karen <kpascale@ycst.com>
Sent: Wednesday, August 28, 2024 2:28 PM
To: Mitchell Epner <mepner@kudmanlaw.com>; Trey Powers <TPOWERS@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

CORRECTION: Tomorrow (Thursday 8/29), I am not available from 12:00 – 1:00 pm, 2:15 – 3:45 pm, or 5:15 – 6:45 pm. Thank you –

Karen



Karen L. Pascale, Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square, 1000 North King Street
Wilmington, DE 19801
P: 302.571.5001 | F: 302.576.3516 | C: 302.388.9420
kpascale@ycst.com | www.youngconaway.com | [vCard](#)

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From: Pascale, Karen
Sent: Wednesday, August 28, 2024 2:21 PM
To: Mitchell Epner <mepner@kudmanlaw.com>; Trey Powers <TPOWERS@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

I am available after 8:00 pm today, and all day tomorrow except 2:15 – 3:45 pm and 5:15 – 6:45 pm.



Karen L. Pascale, Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square, 1000 North King Street
Wilmington, DE 19801
P: 302.571.5001 | F: 302.576.3516 | C: 302.388.9420
kpascale@ycst.com | www.youngconaway.com | [vCard](#)

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From: Mitchell Epner <mepner@kudmanlaw.com>
Sent: Wednesday, August 28, 2024 2:17 PM
To: Trey Powers <TPOWERS@sternekessler.com>; Pascale, Karen <kpascale@ycst.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>; Pascale, Karen <kpascale@ycst.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Counsel,

Apologies for the typo. I “cannot” participate at 3 pm today. I am available at the times listed below.

Sincerely,

Mitchell Epner
Kudman Trachten Aloe Posner LLP
488 Madison Avenue, 23rd Floor
New York, NY 10022
212.868.3602 (direct)
917.783.8280 (mobile)
mepner@kudmanlaw.com

From: Mitchell Epner
Sent: Wednesday, August 28, 2024 2:14 PM
To: Trey Powers <TPOWERS@sternekessler.com>; Pascale, Karen <kpascale@ycst.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>; Pascale, Karen <kpascale@ycst.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Counsel,

I am unavoidably detained in a place where I can participate at 3 pm today. I understand the time sensitivity here. I can make myself available after 8 pm (EDT) today or any time tomorrow after 11 am EDT.

Sincerely,

Mitchell Epner
Kudman Trachten Aloe Posner LLP
488 Madison Avenue, 23rd Floor
New York, NY 10022
212.868.3602 (direct)
917.783.8280 (mobile)
mepner@kudmanlaw.com

From: Trey Powers <TPOWERS@sternekessler.com>
Sent: Tuesday, August 27, 2024 4:02 PM
To: Mitchell Epner <mepner@kudmanlaw.com>; Pascale, Karen <kpascale@ycst.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Three works for me. As long as that works for Karen, let's plan on 3 tomorrow, 8/28.

R. Wilson "Trey" Powers III, Ph.D.
Director
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: tpowers@sternekessler.com
Direct: 202.772.8876

Administrative Assistant: Cheryl Wagner
Direct: 202.772.8961 **Main:** 202.371.2600

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Tuesday, August 27, 2024 2:38 PM
To: ParseUW <ParseUW@sternekessler.com>
Subject: Fwd: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Begin forwarded message:

From: Mitchell Epner <mepner@kudmanlaw.com>
Date: August 27, 2024 at 1:26:20 PM EDT
To: "Pascale, Karen" <kpascale@ycst.com>, Brady Gleason <bgleason@sternekessler.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

To be clear, we are looking for a time on Wednesday 8/28, not today. 3:00 pm EDT works for me.

From: Pascale, Karen <kpascale@ycst.com>
Sent: Friday, August 23, 2024 12:39 PM
To: Brady Gleason <bgleason@sternekessler.com>; Mitchell Epner <mepner@kudmanlaw.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Dear Brady and Mitch: FYI, I have a hard stop at 3:45 pm on Tuesday 8/28 for a 4:00 pm appointment, and thus would appreciate a start time not later than 3:15 pm. Thank you!

Karen



Karen L. Pascale, Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square, 1000 North King Street
Wilmington, DE 19801
P: 302.571.5001 | F: 302.576.3516 | C: 302.388.9420
kpascale@ycst.com | www.youngconaway.com | [vCard](#)

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From: Brady Gleason <bgleason@sternekessler.com>
Sent: Friday, August 23, 2024 12:27 PM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>); Trey Powers <TPOWERS@sternekessler.com>; Pascale, Karen <kpascale@ycst.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Thank you, Mitch. We are available between 1:00 and 4:00 pm on August 28th. In order to make this meet and confer is productive, please serve any objections and responses to the subpoenas by August 27. If you do not serve any objections and responses by August 27, we will consider any objections waived and understand that you intend to produce all documents and communications responsive to the subpoenas.

Please also confirm by August 27 the following:

1. The hit counts on the agreed-upon search terms, which you promised to provide weeks ago; and
2. A date certain for when you will substantially complete production and a date certain for when you will complete production.

If you fail to provide us this information in advance of the meet and confer, or if you do not intend to serve all non-privileged documents responsive to the Shendure and Trapnell subpoenas by **August 30th**, we will seek the appropriate relief.

Regards,
Brady

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Mitchell Epner <mepner@kudmanlaw.com>
Sent: Thursday, August 22, 2024 9:36 AM
To: Brady Gleason <bgleason@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>
Subject: Re: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

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Let us plan to meet and confer on 8/28. Please provide times.

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From: Brady Gleason <bgleason@sternekessler.com>
Sent: Thursday, August 22, 2024 9:34:47 AM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Our last two emails have gone answered. And, despite these subpoenas having been served months ago, we have yet to receive a substantive update from you. If you do not produce all non-privileged documents responsive to the Shendure and Trapnell subpoenas by **August 30th**, we have no choice but to move to compel.

If you cannot produce all non-privileged documents responsive to the Shendure and Trapnell subpoenas by **August 30th**, please provide your availability to meet and confer.

Regards,
Brady

<image002.png>

Brady Gleason
Associate

Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Friday, August 16, 2024 4:44 PM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>; Trey Powers <TPOWERS@sternekessler.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Our email from earlier this week has gone unanswered. And, yet again, you have reneged on a promise to provide a timely update. Your continued obfuscation has significantly prejudiced our ability to prosecute our case.

For now a seventh time, we ask that you provide an update on the status of your production of Dr. Shendure's and Dr. Trapnell's documents. Please do so no later than COB Monday.

Best regards,
Brady

<image002.png>

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Tuesday, August 13, 2024 9:51 AM
To: Trey Powers <TPOWERS@sternekessler.com>; Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Please provide an update on the status of your production of Dr. Shendure's and Dr. Trapnell's documents. During our August 2 call, you agreed to provide an update by the end of last week, but we have yet to hear from you.

Best regards,
Brady

<image002.png>

Brady Gleason

Associate

Sterne, Kessler, Goldstein & Fox P.L.L.C.

Email: bgleason@sternekessler.com

Direct: 202.772.8638

From: Trey Powers <TPOWERS@sternekessler.com>

Sent: Friday, August 2, 2024 10:12 AM

To: Mitchell Epner <mepner@kudmanlaw.com>; Brady Gleason <bgleason@sternekessler.com>

Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com>

Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Thanks for the call just now. I understand you have collected documents from both Dr. Shendure and Dr. Trapnell and that you are running the search terms we previously provided on those documents. I also understand that you will be updating us on progress next week.

We look forward to hearing from you next week.

Thanks very much,
Trey

<image002.png>

R. Wilson "Trey" Powers III, Ph.D.

Director

Sterne, Kessler, Goldstein & Fox P.L.L.C.

Email: tpowers@sternekessler.com

Direct: 202.772.8876

Administrative Assistant: Cheryl Wagner

Direct: 202.772.8961 **Main:** 202.371.2600

From: Trey Powers

Sent: Thursday, August 1, 2024 11:33 AM

To: 'Mitchell Epner' <mepner@kudmanlaw.com>; Brady Gleason <bgleason@sternekessler.com>

Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz <Stephen.Rabinowitz@wolfgreenfield.com>

Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

I will call you at 10 am EDT tomorrow.

Thanks,
Trey

<image002.png>

R. Wilson "Trey" Powers III, Ph.D.

Director

Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: tpowers@sternekessler.com
Direct: 202.772.8876

Administrative Assistant: Cheryl Wagner
Direct: 202.772.8961 Main: 202.371.2600

From: Mitchell Epner <mepner@kudmanlaw.com>
Sent: Thursday, August 1, 2024 11:17 AM
To: Brady Gleason <bgleason@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com>)
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Let's meet and confer tomorrow at 10 am. Please call on 917.783.8280 or send a link.

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From: Brady Gleason <bgleason@sternekessler.com>
Sent: Thursday, August 1, 2024 11:16:20 AM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com>)
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Having not heard from you, unless you provide an alternative time to meet and confer today or tomorrow, we will call your direct office line at 1:30 pm.

Best regards,
Brady

<image002.png>

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Wednesday, July 31, 2024 2:54 PM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW

<ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com)
<Stephen.Rabinowitz@wolfgreenfield.com>

Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB:
Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

We are available tomorrow at 1:30 pm. Please let us know if you are available, and we will circulate a dial-in.

Thank you,
Brady

<image002.png>

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Mitchell Epner <mepner@kudmanlaw.com>
Sent: Wednesday, July 31, 2024 2:13 PM
To: Brady Gleason <bgleason@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB:
Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

I am available for an update tomorrow. Please let me know a good time for you in the afternoon.

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Wednesday, July 31, 2024 2:12 PM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB:
Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

We have still not received any information from you regarding the status of your collection and production of Dr. Shendure's and Dr. Trapnell's documents. We have asked for this information for six weeks. And your email from Friday has become yet another unfulfilled promise by you to provide a prompt response. See e.g., June 20 Email (offering to "come back to you shortly"); July 1 Email (promising "revert in the next few days"); and July 10 Email ("be in a position to discuss Friday

morning"). To make matters worse, each time you fail to meet your own deadline, we do not hear anything from you.

This is now the sixth time we have asked for an update on the status of your collection and production of Dr. Shendure's and Dr. Trapnell's documents. We again request that you provide this update in writing by COB tomorrow. We are also available to meet and confer. If you continue to stonewall, we will seek the appropriate relief from the court.

Best regards,
Brady

<image002.png>

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Mitchell Epner <mepner@kudmanlaw.com>
Sent: Friday, July 26, 2024 11:22 AM
To: Brady Gleason <bgleason@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: Re: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

I am out of office at a memorial service with limited wifi. I will respond on Saturday.

Get [Outlook for iOS](#)

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Thursday, July 25, 2024 3:12:20 PM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Our last two emails to you have gone unanswered, and it have been well over a month since we provided you with a set of search terms for Dr. Trapnell's and Dr. Shendure's ESI. Please provide an update on the status of your collection and production of Dr. Shendure's and Dr. Trapnell's documents in writing by COB tomorrow. We are also available to meet and confer. If our emails continue to go unanswered, we will seek the appropriate relief from the court.

Best regards,
Brady

<image002.png>

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Friday, July 19, 2024 7:09 PM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>)
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Please provide an update on the status of your collection and production of Dr. Shendure's and Dr. Trapnell's documents in writing by Monday. Your delay in providing any substantive response to our repeated requests for this information has prejudiced our ability to prosecute our case.

Thank you,
Brady

<image002.png>

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Brady Gleason
Sent: Thursday, July 11, 2024 8:18 PM
To: 'Mitchell Epner' <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; David Wang <DWang@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>)
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

We are available to discuss on Monday between 11:00 and 1:00 pm or after 4:00 pm. Please let us know if you are available, and we will circulate a dial-in.

Thanks,

Brady

<image002.png>

Brady Gleason

Associate

Sterne, Kessler, Goldstein & Fox P.L.L.C.

Email: bgleason@sternekessler.com

Direct: 202.772.8638

From: Mitchell Epner <mepner@kudmanlaw.com>

Sent: Wednesday, July 10, 2024 5:43 PM

To: Brady Gleason <bgleason@sternekessler.com>; David Wang <DWang@sternekessler.com>

Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey

Powers <TPOWERS@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S

Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>

Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB:

Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

I will be in a position to discuss Friday morning.

From: Brady Gleason <bgleason@sternekessler.com>

Sent: Wednesday, July 10, 2024 12:16 PM

To: Mitchell Epner <mepner@kudmanlaw.com>; David Wang <DWang@sternekessler.com>

Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey

Powers <TPOWERS@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S

Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>

Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB:

Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

It has been nearly three weeks since we shared our proposed search terms, and we have not received a response from you. Please confirm the status of your document collection and production in response to the Shendure and Trapnell subpoenas by COB today.

Best regards,

Brady

<image002.png>

Brady Gleason

Associate

Sterne, Kessler, Goldstein & Fox P.L.L.C.

Email: bgleason@sternekessler.com

Direct: 202.772.8638

From: Mitchell Epner <mepner@kudmanlaw.com>

Sent: Monday, July 1, 2024 5:33 PM

To: Brady Gleason <bgleason@sternekessler.com>; David Wang <DWang@sternekessler.com>

Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey

Powers <TPOWERS@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

I will revert in the next few days.

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Monday, July 1, 2024 5:32 PM
To: Mitchell Epner <mepner@kudmanlaw.com>; David Wang <DWang@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

Please confirm that the proposed search terms are satisfactory, and that your team has begun or will begin the process of collecting and producing documents responsive to the subpoenas served on Dr. Shendure and Dr. Trapnell.

Best regards,
Brady

<image002.png>

Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: bgleason@sternekessler.com
Direct: 202.772.8638

From: Mitchell Epner <mepner@kudmanlaw.com>
Sent: Thursday, June 20, 2024 4:49 PM
To: David Wang <DWang@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; Brady Gleason <bgleason@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (Stephen.Rabinowitz@wolfgreenfield.com) <Stephen.Rabinowitz@wolfgreenfield.com>
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

Thank you for clarifying. I will come back to you shortly with my specific comments.

From: David Wang <DWang@sternekessler.com>
Sent: Thursday, June 20, 2024 4:43 PM
To: Mitchell Epner <mepner@kudmanlaw.com>

Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; Brady Gleason <bgleason@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>)

Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

You don't often get email from dwang@sternekessler.com. [Learn why this is important](#)

Mitch,

We are fine with removing the term "Trapnell" from the search terms to be applied to Trapnell ESI and the same for "Shendure." This agreement is reflected in the attached set of search terms.

Also, please note that we are using the * character as a root expander because that is how our document review platform, Relatively, interprets that character. Depending on what platform you intend to use, you may have to replace this * root expander with a different character, such as !.

Best regards,
David

<image002.png>

David Wang
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: dwang@sternekessler.com
Direct: 202.772.8814 Main: 202.371.2600

From: Mitchell Epner <mepner@kudmanlaw.com>
Sent: Wednesday, June 19, 2024 4:43 PM
To: Brady Gleason <bgleason@sternekessler.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>; Stephen S Rabinowitz (<Stephen.Rabinowitz@wolfgreenfield.com> <Stephen.Rabinowitz@wolfgreenfield.com>)
Subject: RE: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

EXTERNAL EMAIL: Use caution before clicking links or attachments.

Brady,

Thank you for providing these terms. I will review and revert.

Please let me know, as an initial matter, whether it is your request that the term "Shendure" should be run on items in the possession, custody or control of Dr. Shendure and that the term "Trapnell" should be run on the items in the possession custody or control of Dr. Trapnell? On my initial review, this would include suggested search terms 21, 23, 24, and 25. Obviously, any document sent to or received by Dr. Shendure would have "Shendure" in it and any document sent to or received by Dr. Trapnell would have "Trapnell" in it.

Sincerely,
Mitch

Mitchell Epner
Kudman Trachten Aloe Posner LLP
488 Madison Avenue, 23rd Floor
New York, NY 10022
212.868.3602 (direct)
917.783.8280 (mobile)
mepner@kudmanlaw.com

From: Brady Gleason <bgleason@sternekessler.com>
Sent: Wednesday, June 19, 2024 4:31 PM
To: Mitchell Epner <mepner@kudmanlaw.com>
Cc: Byron Pickard <BPICKARD@sternekessler.com>; Chandrika Vira <CVIRA@sternekessler.com>; Trey Powers <TPOWERS@sternekessler.com>; ParseUW <ParseUW@sternekessler.com>
Subject: Scale Biosciences, Inc. et al. v. Parse Biosciences Inc. et al., No. 1:22-cv-01597-CJB: Subpoenas to Dr. Shendure & Dr. Trapnell

Mitch,

As requested, attached is a set of search terms for Dr. Trapnell's and Dr. Shendure's ESI. Although these terms are based on the agreed-upon terms used by the University of Washington and ScaleBio in this case, we have tailored these to address responsive documents likely to be in the possession, custody, or control of Dr. Trapnell and Dr. Shendure.

We understand that it is your position that Dr. Trapnell and Dr. Shendure need not collect any documents responsive to the subpoenas that are stored on University of Washington servers. We are aware of only one repository stored on UW's servers likely to include responsive documents—Dr. Trapnell's UW email account, which has already been collected at the request of ScaleBio in this case. As we explained during our call last week, Dr. Shendure has configured his UW email account such that all emails sent to his UW account are relayed to a different account and not stored on UW's servers. We believe, but cannot confirm, that Dr. Shendure is forwarding his UW emails to his Gmail account—"shendure@gmail.com". To be clear, however, the subpoena seeks all non-privileged responsive documents from Dr. Shendure, regardless of the specific email account used.

We have also looked into how professors at the University of Washington like Dr. Trapnell and Dr. Shendure save or store non-email ESI. It is our understanding that, most likely, Dr. Trapnell and Dr. Shendure would have saved non-email ESI relevant to this case on third-party servers and not on any server maintained by the University of Washington. Such documents, to the extent they exist and are responsive, are contemplated by the subpoenas served on Dr. Trapnell and Dr. Shendure and should be collected by your team accordingly.

To the extent Dr. Trapnell and Dr. Shendure saved or stored (electronically or otherwise) any responsive documents that you contend are within the possession, custody, and control of the University of Washington, we ask that you identify the location and nature of those documents as soon as possible. If we are given timely notice, we would be willing to bear the cost of collecting and producing such documents, provided that they are indeed within the possession, custody, and control of the University of Washington and readily accessible.

Please let us know your position on this proposal. And, if the search terms attached this email are agreeable, please provide an estimate on when we can expect a production of Dr. Trapnell's and Dr. Shendure's documents.

Best regards,
Brady



Brady Gleason
Associate
Sterne, Kessler, Goldstein & Fox P.L.L.C.
1101 K Street NW, 10th Floor, Washington, DC 20005
<image002.png>
Email: bgleason@sternekessler.com
Direct: 202.772.8638
IP Assistant: Albert Yeboah
Main: 202.371.2600 **Direct:** 202.772.8932

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